

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X	:	
JIMMIE MECCYA WILLIAMS,	:	
	:	Case No.: 05 Civ. 5909 (HB)
Plaintiff,	:	
	:	
vs.	:	
	:	
TADD LAZARUS, M.D., P.C., ET AL.	:	
	:	
and	:	
	:	
ST CLARE'S HOSPITAL AND HEALTH	:	
CENTER,	:	
	:	
Defendants.	:	
-----X	:	

**NOTICE OF MOTION IN LIMINE TO EXCLUDE EVIDENCE OF
OR REFERENCE TO ANY PRIOR OR SUBSEQUENT "BAD ACTS" BY
OR CRIMINAL CONVICTIONS OF PLAINTIFF**

PLEASE TAKE NOTICE that Plaintiff Jimmie Meccya Williams will move this Court, before the Honorable Harold Baer, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, on March 12, 2007 at 9:30 am, or as soon thereafter as counsel can be heard, in accordance with Paragraph 3(E) of the Court's Individual Practices, for an order, pursuant to Federal Rules of Evidence 401 through 403, 608, 609 and 611, and the Court's inherent power, prohibiting Defendant St. Clare's Hospital and Health Center ("St. Clare's") from introducing at trial evidence of, or referring to, any prior or subsequent "bad acts" by or criminal convictions of Plaintiff, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Plaintiff

will rely upon the Memorandum of Law and Declaration of Joshua R. Geller submitted herewith,
as well as all other papers and proceedings had in this action.

Dated: New York, New York
February 14, 2007

SIMPSON THACHER & BARTLETT LLP

By: _____ /s/
Paul C. Gluckow (PG-0159)
Joshua R. Geller (JG-0187)
Emma Lindsay (EL-0604)

425 Lexington Avenue
New York, New York 10017-3954
Telephone: (212) 455-2000
Facsimile: (212) 455-2502

Attorneys for Plaintiff